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Office of the Secretary  
Federal Communications Commission  
Room 222  
1919 M. Street, NW  
Washington, DC 20554

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**Comments on RM 9208**

The following comments on this rulemaking are submitted by Ed Crook. I have been in the broadcast industry since 1957. I have been a General Manager of radio stations, owner of a number of FM stations as well as owning FM Translators.

I am addressing this petition and other petitions concerning Low Power FM.

I agree that there is a need for a local broadcast service to supplement those areas where there is a lack of community coverage. However, I do not agree with this petition in that the petitioner has complicated its proposal and has ignored the fact that all the technical rules to operate a LPFM already exist. Those rules are the technical rules that govern FM translators. By adding different classes of LPFM, it creates a technical nightmare and puts a greater burden on the FCC. FM translator equipment is already type accepted and is affordable to construct and operate.

The FCC should allow present and/or future FM translators to originate programming. In doing so, the present FM translator licensee would have the option to continue to rebroadcast other FM signals pursuant to their original license or apply to originate programming for the community they are presently serving. Furthermore, the rules should be amended to stipulate that present licensed FM translators can not be "bumped". Instead a new frequency must be used for local community service.

In conclusion, I do not see a need for this proposal and the FCC does not have the resources to handle and process thousands of applications. Again, use the resources at hand that being FM Translator Rules.

Thank you, for your consideration of these comments.

Sincerely,

  
Ed Crook